

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

DENEISE INGRAM, as Legal Guardian	)	CASE NO. 8:09-cv-110
for KAREN CHANDLER,	)	
	)	
Plaintiff,	)	
	)	MOTION TO DISMISS
v.	)	DEFENDANT COVENANT CARE, INC.
	)	
COVENANT CARE MIDWEST, INC.,	)	
d/b/a NEBRASKA SKILLED NURSING	)	
AND REHABILITATION, and	)	
COVENANT CARE, INC.	)	
	)	
Defendant.	)	

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the Plaintiff, and moves this Court for an Order dismissing defendant Covenant Care, Inc. as a party to this action.

In support of this Motion, Plaintiff would show that discovery has revealed that liability rests solely with the remaining Defendant, Covenant Care Midwest, Inc., d/b/a Nebraska Skilled Nursing and Rehabilitation. Further, that the undersigned has conferred with opposing counsel, who has no objection to the filing of same.

WHEREFORE, Plaintiff prays that this Motion be granted and sustained by appropriate Order of this Honorable Court.

DATED this 10<sup>th</sup> day of September, 2010.

DENEISE INGRAM, as Legal Guardian for  
KAREN CHANDLER, Plaintiff

By s/ Matthew G. Miller  
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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 10<sup>th</sup> day of September, 2010, I electronically filed and the foregoing document with the Clerk of the Court by using the CM/ECF system which sent notification of such filing upon all parties who filed an appearance or motion by electronic filing in this case to the following:

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By   s/ Matthew G. Miller